

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

**NETLIST, INC.'S UNOPPOSED MOTION FOR EXPEDITED BRIEFING
SCHEDULE ON (1) ITS MOTION TO ENFORCE THE COURT'S
PRETRIAL ORDER REGARDING WITNESS LISTS [DKT. 606] AND (2)
MOTION REQUESTING THE ISSUANCE OF A TRIAL DEPOSITION
SUBPOENA FOR DR. ANDREAS GROEHN [DKT. 808]**

Pursuant to Local Rule CV-7(e), Netlist respectfully files this Motion to Expedite Briefing on its (1) Motion to Enforce the Court's Pretrial Order Regarding Final Witness Lists, Dkt. 606, and (2) Motion Requesting the Issuance of a Trial Deposition Subpoena for Dr. Andreas Groehn, Dkt. 608. Netlist filed both motions this morning, on November 1, 2024, and Netlist requests that Samsung's responses be due on November 5, 2024, at 12:00 pm CT, so that both motions can be fully briefed and resolved prior to trial, which is scheduled to begin with jury selection on November 12, 2024. The parties have conferred on the briefing schedule for their respective motions filed this morning and this motion is unopposed.

Dated: November 1, 2024

Respectfully submitted,

/s/ Jason Sheasby

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 East Houston Street Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Jason Sheasby (*pro hac vice*)
jsheasby@irell.com
Annita Zhong, PhD (*pro hac vice*)
hzhong@irell.com
Andrew Strabone (*pro hac vice*)
astrabone@irell.com
Yanan Zhao (*pro hac vice*)

yzhao@irell.com

Michael W. Tezyan (*pro hac vice*)

mtezyan@irell.com

IRELL & MANELLA LLP

1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

Tel. (310) 277-1010

Fax (310) 203-7199

Rebecca Carson (*pro hac vice*)

rcarson@irell.com

IRELL & MANELLA LLP

840 Newport Center Drive, Suite 400

Newport Beach, CA 92660

Attorneys for Plaintiff Netlist, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on November 1, 2024, a copy of the foregoing was served to all counsel of record via the Court's ECF System.

/s/ N. Isabella Chestney

N. Isabella Chestney

CERTIFICATE OF CONFERENCE

I hereby certify that, on October 31, 2024, counsel for the parties met and conferred on the briefing schedule for the motions filed this morning. Netlist understands that Samsung does not oppose this motion.

/s/ Jason Sheasby

Jason Sheasby